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June 10, 2025

VIA ECF

Hon. Loretta A. Preska
United States Courthouse
500 Pearl Street, Room 2220
New York, NY 10007

Re: Peterson v. Islamic Republic of Iran, No. 13 Civ. 9195 (LAP)

Dear Judge Preska:

My firm represents the Plaintiffs in the above-captioned action. I write to request permission to file under seal the following 29 Exhibits to the Declaration of Liviu Vogel [370] filed in support of Plaintiffs' Motion for Summary Judgment. The Exhibits were filed on the public docket in redacted form as follows:

ECF #	Vogel Exhibit #
370-13	Exhibit 13
370-14	Exhibit 14 – Part 1
370-15	Exhibit 14 – Part 2
370-17	Exhibit 16
370-18	Exhibit 17
370-35	Exhibit 39 – Part 1
370-36	Exhibit 39 – Part 2
370-40	Exhibit 44
370-41	Exhibit 45
370-42	Exhibit 46
370-43	Exhibit 47
370-44	Exhibit 48

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370-45	Exhibit 49
370-46	Exhibit 50
370-47	Exhibit 51
370-48	Exhibit 52
370-49	Exhibit 53
370-50	Exhibit 54 – Part 1
370-51	Exhibit 54 – Part 2
370-52	Exhibit 55
370-53	Exhibit 57
370-60	Exhibit 63 – Part 1
370-61	Exhibit 63 – Part 2
370-64	Exhibit 66 – Part 1
370-65	Exhibit 66 – Part 2
370-68	Exhibit 69
370-70	Exhibit 71
370-71	Exhibit 72
370-74	Exhibit 75
370-80	Exhibit 81
370-83	Exhibit 84
370-84	Exhibit 85
370-85	Exhibit 86
370-90	Exhibit 99

All of the above Exhibits have been submitted to the Court previously, including in 2020 in support of Plaintiffs' motion for summary judgment or, in the alternative, for a preliminary injunction, and in opposition to the Clearstream Banking, S.A.'s and Bank Markazi's motions to dismiss. The information that the parties have redacted from the publicly filed versions of these Exhibits is limited to third-party financial information and personal identifying information that Defendants contend

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is potentially subject to foreign privacy laws. The redactions are consistent with the scope of redactions approved in the October 18, 2017 order issued by the Second Circuit Court of Appeals in *Peterson v. Islamic Republic of Iran*, Docket No. 15-0690 [ECF 279], a copy of which is annexed hereto.

This Court has previously approved the filing under seal of the information redacted from the above-listed Exhibits by orders entered on August 28, 2020 [ECF 235] (sealing Exhibits 13, 14, 16, 17, 39, 44-55, 57, 63, 66, 69, 71, 72, 75, 81); October 5, 2020 [ECF 264] (sealing Exhibits 84-86), and October 14, 2020 [ECF 275] (sealing Exhibit 99).

In accordance with Your Honor's Individual Practices, a copy of this letter motion together with redacted and un-redacted copies of the above-listed Exhibits will be e-mailed to Chambers.

Respectfully submitted,

/s/ Susan M. Davies

CC: All counsel (via ECF)

Attachment: Second Circuit October 10, 2017 Order [279]

The motion to file under seal information redacted from the above-listed Exhibits is granted. The Clerk of the Court shall close dkt. no. 374. **SO ORDERED.**



Loretta A. Preska
United States District Judge

June 12, 2025
New York, New York